

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NL PROPERTIES, LLC,)
)
Plaintiff,)
)
v.) Case No. 1:08CV865
)
)
BRIDGE, STRUCTURAL &) Judge Guzman
REINFORCING IRON WORKERS)
LOCAL UNION #1,)
)
Defendant.)

JOINT DISCOVERY PLAN

1. Pursuant to Fed. R. Civ. P. 26(f) and this Court's order, a meeting was held by telephone on March 25, 2008, attended by Clifford Godiner for Plaintiff, and by Frank Marco for Defendant.
2. **Pre-Discovery Disclosures.** The parties will exchange by April 30, 2008, the information required by Fed. R. Civ. P. 26(a)(1).
3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: the events of February 8, 2008; Defendant's motives in picketing Plaintiff's worksite; and Plaintiff's damages incurred as a result thereof.

All discovery commenced in time to be completed by September 15, 2008.

Maximum of 25 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum of 25 requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of 10 depositions by plaintiff and 10 by defendant. Each deposition limited to maximum of 7 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:
from plaintiff(s) by July 1, 2008
from defendant(s) by August 15, 2008

Supplementations under Rule 26(e) due September 15, 2008.

4. **Other Items.**

The parties request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in November 2008.

Plaintiff should be allowed until April 30, 2008, to join additional parties and until April 30, 2008, to amend the pleadings.

Defendant should be allowed until May 10, 2008, to join additional parties and until May 10, 2008 to amend the pleadings.

All potentially dispositive motions should be filed by October 15, 2008.

Settlement cannot be evaluated prior to July 15, 2008, and may be enhanced by use of the following alternative dispute resolution procedure: mediation.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
from plaintiff(s) by
from defendant(s) by 30 days before trial

Parties should have 15 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by December 15, 2008, and at this time is expected to take approximately 2 days.

Date: March 27, 2008

Respectfully submitted,

GREGORIO & ASSOCIATES

THOMPSON COBURN FAGEL HABER
LLP

By:/s/Frank A. Marco (with consent)

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